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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

2-WAY COMPUTING, INC., a Nevada corporation,)	Case No.: 2:16-cv-00423-GMN-CWH
)	
Plaintiff,)	
v.)	STIPULATION AND [PROPOSED]
)	ORDER TO EXTEND DEADLINE
)	FOR FILING RESPONSE TO
)	INITIAL NON- INFRINGEMENT,
UNIFY INC. F/K/A SIEMENS ENTERPRISE)	INVALIDITY, AND
COMMUNICATIONS, a Delaware corporation,)	UNENFORCEABILITY
)	CONTENTIONS
Defendant.)	
)	(Second Request)

Plaintiff 2 Way Computing, Inc. (“2 Way” or “Plaintiff”) and Unify Inc. (“Unify” or “Defendant”) by and through their attorneys, hereby file this Stipulation and [Proposed] Order to Extend Deadline for Filing Response to Initial Non-Infringement, Invalidity, and Unenforceability Contentions. This request is filed in compliance with LR IA 6-1, LR IA 6-2, and LR 7-1. This is the second request to extend this deadline. This request is not made after the deadline which is currently October 5, 2016.

The parties are currently engaged in settlement discussions which may resolve the claims of this litigation. In order to allow the parties additional time to continue ongoing settlement discussions before a response is due, the parties request that the current deadline be extended an additional seven (7) days until Wednesday, October 12, 2016. The litigation of this matter will be best served by the proposed extension.

Accordingly, Plaintiff and Defendant respectfully request that the Court grant this request to continue the deadline for Filing Response to Initial Non- Infringement, Invalidity, and Unenforceability Contentions (LPR 1-10) until October 12, 2016.

Dated: October 4, 2016

/s/ Mark Borghese
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ORDER

IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATED: October 5, 2016

CERTIFICATE OF SERVICE

I am a resident of Clark County, Nevada and am over the age of 18 years and not a party to the action. My business address is: 10161 Park Run Drive, Suite 150, Las Vegas, Nevada, 89145.

On **October 4, 2016**, I served this document on the parties listed on the attached service list via one or more of the methods of service described below as indicated next to the name of the served individual or entity by a checked box:

PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

EMAIL: By transmitting a copy of the document to the electronic-mail address designated by the attorney or the party who has consented to such manner of service.

E-FILE: Automatically through the court's electronic filing system.

FAX SERVICE: by transmitting to a facsimile machine maintained by the attorney or the party who has consented to such manner of service.

MAIL SERVICE: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada. I am readily familiar with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

I declare that under penalty of perjury under the laws of the State of Nevada that the above is true and correct. I further declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

/s/ Mark Borghese

An employee of BORGHESE LEGAL, LTD.

SERVICE LIST

ATTORNEYS OF RECORD	PARTIES REPRESENTED	METHOD OF SERVICE
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